

# **Exhibit C**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

Rio Tinto plc,	:	
	:	
Plaintiff,	:	Civil Action No. 14-cv-3042 (RMB) (AJP)
	:	
v.	:	
	:	
Vale S.A., Benjamin Steinmetz, BSG	:	
Resources Limited, VBG-Vale BSGR	:	
Limited aka BSG Resources (Guinea) Ltd.	:	
aka BSG Resources Guinée Ltd, BSG	:	
Resources Guinée SARL aka BSG	:	
Resources (Guinea) SARL aka VBG-Vale	:	
BSGR, Frederic Cilins, Mamadie Touré,	:	
and Mahmoud Thiam,	:	
	:	
Defendants.	:	
	:	
	:	

**DEFENDANTS BENJAMIN STEINMETZ'S AND BSG RESOURCES LIMITED'S  
AMENDED INITIAL DISCLOSURES PURSUANT TO FED. R. CIV. P. 26(a)(1)**

Pursuant to Federal Rule of Civil Procedure ("FRCP") 26(a)(1), defendants Benjamin Steinmetz and BSG Resources Limited ("BSGR") (collectively, "Defendants"), by and through their undersigned counsel, Mishcon de Reya New York LLP, hereby provide the following amended initial disclosures. Defendants make these initial disclosures based upon information obtained to date and reasonably available to them at this time, and subject to, and without waiver of, the limitations and objections as to these disclosures set forth herein. Defendants expressly reserve all rights to modify, amend, or otherwise supplement these initial disclosures set forth below in light of additional investigation, discovery, information, and developments in this case. By making these initial disclosures, Defendants do not represent that they are identifying every witness, document, or tangible thing possibly relevant to this lawsuit. Rather, Defendants' initial disclosures represent a good faith effort to identify information they reasonably believe are

required by FRCP 26(a)(1), subject to, and without waiver of, the limitations and objections as to these disclosures set forth herein.

Defendants' initial disclosures are made without, in any way, waiving: (1) the right to object to any discovery requests or to the admissibility of any evidence on the grounds of attorney-client privilege, the attorney work product doctrine, other applicable privileges or protections, competency, relevance, materiality, prejudice, hearsay, or any other proper ground in this action or in any other action; (2) the right to object to the use of any such information, for any purpose, in whole or in part, in any proceeding in this action or in any other action; or (3) the right to object on any and all grounds, at any time, to any other discovery request or proceeding involving or relating to the subject matter of these initial disclosures in any proceeding in this action or in any other action. All such objections and grounds are reserved and may be interposed at trial.

Defendants' initial disclosures further are made without, in any way, waiving any defenses and/or objections to the Court's jurisdiction over them in this action. Defendants expressly provide their intention to, and reserve all rights to, object to the Court's jurisdiction over them under FRCP 12(b)(2) and any other appropriate grounds.

Defendants' investigation also remains ongoing and they further reserve the right to supplement or correct these disclosures as necessary, pursuant to FRCP 26(e), based upon further investigation and discovery.

**A. Persons Having Knowledge of Relevant Facts**

Defendants incorporate each of the general objections and limitations set forth above into the following disclosures. Pursuant to FRCP 26(a)(1)(A)(i), and subject to, and without waiver of, the objections and limitations stated above and set forth herein, Defendants identify the

following individuals presently known to them who are likely to have discoverable information that Defendants may use to support their claims or defenses in this action. Defendants do not consent to or authorize any communications with their current or former employees or agents, which are prohibited by the applicable rules of professional conduct, invade areas of privilege, or are outside the discovery methods provided for in the Federal Rules of Civil Procedure. The following list shall not be interpreted to be an admission that any of the listed individuals will have discoverable information.

	<u>NAME</u>	<u>LAST KNOWN ADDRESS &amp; TELEPHONE, IF AVAILABLE</u>	<u>SUBJECT</u>
<b>Guinean Government</b>			
1	Ahmed Tidiane Souare, former Guinean Prime Minister	Conakry, Guinea	Knowledge concerning BSGR's acquisition of Simandou mining rights in accordance with Guinean mining code
2	Alpha Condé, Guinean President	Presidential Palace, Conakry, Guinea	Knowledge that South African business interests supplied illicit funds to rig the March 2010 Guinean Presidential election in exchange for a share in the Simandou mining rights wrongfully misappropriated from BSGR
3	Captain Mamadou Sande, former Guinean Minister of the Economy and Finances	Ministry of Economy and Finances Boulevard Trade Kaloum Conakry 579 Guinea	Knowledge of "the Base Convention", pursuant to which BSGR acquired Simandou mining rights
4	Cellou Diallo, former Guinean Prime Minister	c/o Union of Democratic Forces of Guinea Carrefour Chinese, Belle-Vue. Conakry, Guinea	Knowledge of the corrupt rigging of the March 2010 Guinean Presidential election by which Alpha Conde became President, and of the wrongful misappropriation of BSGR's Simandou mining rights

5	Centre de Promotion et de Développement Miniers	BP 295 Conakry, Guinea Tel: +224 41 15 44	Knowledge of BSGR's technical and operational capabilities for mining in Simandou and of contacts with BSGR's personnel beginning in 2005
6	Comité Technique de Revue des Titres et Conventions Miniers	Villa 26, City of Nations, Kaloum, Conakry Guinea Tel: +224 631 921 212	Knowledge of political circumstances surrounding wrongful misappropriation of BSGR's mining rights
7	Commission Electorale Nationale Indépendante (CENI)	Quartier Cameroun – Commune de Dixinn B.P. 1032 Conakry, Guinea Tel: +224 664 02 03 23	Knowledge of meeting between Alpha Conde and agents of the South African Secret Service ("SASS"), Waymark (a South African IT company involved in the rigging of the March 2010 election) and representatives of CENI, including Ben Sekou Sylla and Louceny Camara
8	Gnillaume Curtis, former Guinean Minister of Mines and Geology	Conakry, Guinea	Knowledge of the wrongful misappropriation of BSGR's Simandou mining rights
9	Ibrahima Kali Soumah, Executive Director, Centre de Promotion et de Développement Miniers	Ministry of State for Transport and Public Works BP 295 Conakry, Guinea Tel: +224 41 15 44	Knowledge of the circumstances surrounding the award of BSGR's Simandou mining concession
10	Jean Marie Doré, former Guinean Prime Minister	Conakry, Guinea	Knowledge of the facts and circumstances surrounding the "withdrawal" by the Guinean government in 2008 of Rio Tinto's Simandou mining concession

11	Kerfala Yansané, Guinean Minister of Finance; former Minister of Mines	Ministry of Economy and Finances Boulevard Trade Kaloum Conakry 579 Guinea	Knowledge of, and participation in, receipt of illicit funds from South African business interests, including the Walter Hennig Group and Palladino Capital, in connection with the rigged March 2010 Guinean Presidential election, the wrongful misappropriation of BSGR's Simandou mining rights, and the granting thereof to those South African business interests
12	Louceny Camara, former Vice President of CENI	Quartier Cameroun – Commune de Dixinn B.P. 1032 Conakry, Guinea Tel: +224 664 02 03 23	Knowledge of the corrupt rigging of the March 2010 Guinean Presidential election, and of the participation of Alpha Conde, the SASS, CENI, and Waymark therein
13	Louceny Nabé, former Guinean Minister of Mines	Central Bank of the Republic of Guinea Boulevard du Commerce, Common Kaloum Conakry, Guinea Tel +224 41 26 51	Knowledge of BSGR's technical and operational mining capabilities in Simandou, of contacts with BSGR's personnel as early as 2005, and of the "withdrawal" by the Guinean Government in 2008 of Rio Tinto's Simandou mining concession
14	Mamoudou Kouyate, Advisor to President Conté	Conakry, Guinea	Knowledge of facts and circumstances surrounding the wrongful misappropriation of BSGR's Simandou mining rights
15	Mohamed Lamine Fofana, Former Guinean Minister of Mines	Immeuble OFAB - CBG Boulevard du Commerce B.P. 295 Conakry, Guinea Tel: +224 30 45 45 26	Knowledge of the corrupt rigging of the March 2010 Guinean Presidential election by which Alpha Conde became President, and of the wrongful misappropriation of BSGR's Simandou mining rights
16	National Mining Commission	Villa 26, City of Nations, Kaloum Conakry, Guinea	Knowledge of facts and circumstances surrounding the wrongful misappropriation of BSGR's Simandou mining rights



17	Sékouba Konate, former President of Guinea	Presidential Palace, Conakry, Guinea	Knowledge of the corrupt rigging of the March 2010 Guinean Presidential election by which Alpha Conde became President, and of the wrongful misappropriation of BSGR's Simandou mining rights
18	The Strategic Committee (created by decree of President Alpha Condé on March 29, 2012)	Conakry, Guinea	Knowledge of facts and circumstances surrounding the wrongful misappropriation of BSGR's Simandou mining rights
<b>South African Government/SASS</b>			
19	Gibson Njenje a/k/a Gibson Jente, Agent of State Security Agency (SSA), the National Intelligence Agency (NIA), and the SASS	Arcadia Building Hatfield Pretoria, 0083 South Africa Tel: +27 (012) 342-1122	Knowledge of facts and circumstances surrounding the involvement of the SASS in the corrupt rigging of the March 2010 Guinean Presidential election and of the unlawful misappropriation of BSGR's Simandou mining rights
20	Hein Van Neikerk, former Agent of State Security Agency (SSA), the National Intelligence Agency (NIA), and the SASS	Arcadia Building Hatfield Pretoria, 0083 South Africa Tel: +27 (012) 342-1122	Knowledge of facts and circumstances surrounding the involvement of the SASS in the corrupt rigging of the March 2010 Guinean Presidential election and of the unlawful misappropriation of BSGR's Simandou mining rights
21	Kgalema Motlanthe, Deputy President of South Africa	Union Buildings Pretoria, South Africa	Knowledge of facts and circumstances surrounding the involvement of the SASS in the corrupt rigging of the March 2010 Guinean Presidential election and of the unlawful misappropriation of BSGR's Simandou mining rights
22	Moe Shaik, former Director-General, State Security Agency (SSA), the National Intelligence Agency (NIA), and the SASS	Arcadia Building Hatfield Pretoria, 0083 South Africa Tel: +27 (012) 342-1122	Knowledge of facts and circumstances surrounding the involvement of the SASS in the corrupt rigging of the March 2010 Guinean Presidential election and of the unlawful misappropriation of BSGR's Simandou mining rights

23	Tadiso (a/k/a Thabiso), Agent of State Security Agency (SSA), the National Intelligence Agency (NIA), and the SASS	Arcadia Building Hatfield Pretoria, 0083 South Africa Tel: +27 (012) 342-1122	Knowledge of facts and circumstances surrounding the involvement of the SASS in the corrupt rigging of the March 2010 Guinean Presidential election and of the unlawful misappropriation of BSGR's Simandou mining rights
<b>South African Individuals and Businesses</b>			
24	Brian Menell	c/o Kemet Group Cyprus P.O. Box 22657 1523 Nicosia Cyprus	Knowledge of the corrupt rigging of the March 2010 Guinean Presidential election by which Alpha Conde became President, and of the wrongful misappropriation of BSGR's Simandou mining rights
25	Fugro Survey Africa (Pty) Ltd.	Woodbridge Business Park Koeberg Road Milnerton Cape Town, South Africa Tel: +27 21 527 8900	Knowledge of geophysical surveys in Simandou performed in 2006 on behalf of BSGR
26	Ivor Ichikowitz	c/o Paramount Group 1 Sandton Drive Sandton 2196 South Africa Tel: +27 11 086 6800	Knowledge of the corrupt rigging of the March 2010 Guinean Presidential election by which Alpha Conde became President, and of the wrongful misappropriation of BSGR's Simandou mining rights
27	Mark Willcox, former Chief Investment Officer, Mvelaphanda Holdings	c/o Mvelaphanda Holdings 23 Glenhove Road Johannesburg, Gauteng 2196 South Africa	Knowledge of the corrupt rigging of the March 2010 Guinean Presidential election by which Alpha Conde became President, and of the wrongful misappropriation of BSGR's Simandou mining rights
28	Mikki Sivuyile Macmillan Xayiya, Executive Chairman, Mvelaphanda Group Limited	c/o Mvelaphanda Holdings 23 Glenhove Road Johannesburg, Gauteng 2196 South Africa	Knowledge of the corrupt rigging of the March 2010 Guinean Presidential election by which Alpha Conde became President, and of the wrongful misappropriation of BSGR's Simandou mining rights



29	The MSA Group	20B Rothesay Avenue Craighall Park Johannesburg 2196 South Africa	Knowledge of geophysical surveys in Simandou performed in 2006 on behalf of BSGR
30	Mvelaphanda Holdings	23 Glenhove Road Johannesburg, Gauteng 2196 South Africa	Knowledge of the corrupt rigging of the March 2010 Guinean Presidential election by which Alpha Conde became President, and of the wrongful misappropriation of BSGR's Simandou mining rights
31	Samuel (Samy) Mebiame, Representative of Palladino	Johannesburg or Pretoria, South Africa	Knowledge of the corrupt rigging of the March 2010 Guinean Presidential election by which Alpha Conde became President, and of the wrongful misappropriation of BSGR's Simandou mining rights
32	Walter Hennig	Johannesburg, South Africa	Knowledge of the corrupt rigging of the March 2010 Guinean Presidential election by which Alpha Conde became President, and of the wrongful misappropriation of BSGR's Simandou mining rights
33	Walter Hennig Group	Johannesburg, South Africa	Knowledge of the corrupt rigging of the March 2010 Guinean Presidential election by which Alpha Conde became President, and of the wrongful misappropriation of BSGR's Simandou mining rights
34	Waymark Infotech	Podium at Menlyn Ground Floor 43 Ingersol Road Menlyn 0181 Pretoria South Africa	Knowledge of the corrupt rigging of the March 2010 Guinean Presidential election by which Alpha Conde became President

<b>BSGR</b>			
35	Asher Avidan, BSG Resources Ltd.	c/o BSG Resources Limited West Wing Frances House, Sir William Place St. Peter Port, Guernsey GY1 1GX Tel: +44(0)1481 811999	Knowledge of BSGR's operations in Guinea concerning its Simandou mining rights and of negotiations between BSGR and Vale, S.A. related to a potential joint venture at Simandou
36	Frank Eagar, BSG Resources Ltd.	c/o BSG Resources Limited West Wing Frances House, Sir William Place St. Peter Port, Guernsey GY1 1GX Tel: +44(0)1481 811999	Knowledge of BSGR's operations in Guinea concerning its Simandou mining rights and of negotiations between BSGR and Vale, S.A. related to a potential joint venture at Simandou
37	Gerry Wilson, BSG Resources Ltd.	c/o BSG Resources Limited West Wing Frances House, Sir William Place St. Peter Port, Guernsey GY1 1GX Tel: +44(0)1481 811999	Knowledge of BSGR's operations in Guinea concerning its Simandou mining rights and of negotiations between BSGR and Vale, S.A. related to a potential joint venture at Simandou
38	Ian Cope, BSG Resources Ltd.	c/o BSG Resources Limited West Wing Frances House, Sir William Place St. Peter Port, Guernsey GY1 1GX Tel: +44(0)1481 811999	Knowledge of BSGR's operations in Guinea concerning its Simandou mining rights and of negotiations between BSGR and Vale, S.A. related to a potential joint venture at Simandou
39	Iwan Williams, BSG Resources Ltd.	c/o BSG Resources Limited West Wing Frances House, Sir William Place St. Peter Port, Guernsey GY1 1GX Tel: +44(0)1481 811999	Knowledge of BSGR's operations in Guinea concerning its Simandou mining rights and of negotiations between BSGR and Vale, S.A. related to a potential joint venture at Simandou

40	Marc Struik BSG Resources Ltd.	c/o BSG Resources Limited West Wing Frances House, Sir William Place St. Peter Port, Guernsey GY1 1GX Tel: +44(0)1481 811999	Knowledge of BSGR's operations in Guinea concerning its Simandou mining rights and of negotiations between BSGR and Vale, S.A. related to a potential joint venture at Simandou
41	Peter Driver BSG Resources Ltd.	c/o BSG Resources Limited West Wing Frances House, Sir William Place St. Peter Port, Guernsey GY1 1GX Tel: +44(0)1481 812000	Knowledge of BSGR's operations in Guinea concerning its Simandou mining rights and of negotiations between BSGR and Vale, S.A. related to a potential joint venture at Simandou
<b>Rio Tinto</b>			
42	Debra Valentine, Group Executive, Legal and External Affairs	c/o Rio Tinto 2 Eastbourne Terrace London W2 6LG United Kingdom Tel: +44 (0) 20 7781 2000	Knowledge of subject matter of lawsuit
43	Jordan Feildars, Communications Manager, Simfer S.A.	c/o Simfer S.A. Immeuble Bellevue, Boulevard Bellevue, D.I 536, Commune de Dixinn BP 848, Conakry, Guinea	Knowledge of subject matter of lawsuit
44	Laura Mann (née White), Principal Advisor, External Affairs	c/o Rio Tinto 2 Eastbourne Terrace London W2 6LG United Kingdom Tel: +44 (0) 20 7781 2000	Knowledge of subject matter of lawsuit
45	Richard Morgan, Head of Government Relations	c/o Rio Tinto 2 Eastbourne Terrace London W2 6LG United Kingdom Tel: +44 (0) 20 7781 2000	Knowledge of subject matter of lawsuit

46	Robert Court, Global Head of External Relations	c/o Rio Tinto 2 Eastbourne Terrace London W2 6LG United Kingdom Tel: +44 (0) 20 7781 2000	Knowledge of subject matter of lawsuit
47	Sam Walsh, Chief Executive Officer	c/o Rio Tinto 2 Eastbourne Terrace London W2 6LG United Kingdom Tel: +44 (0) 20 7781 2000	Knowledge of subject matter of lawsuit
48	Simfer S.A.	Immeuble Bellevue, Boulevard Bellevue, D.I 536, Commune de Dixinn BP 848, Conakry, Guinea	Knowledge of subject matter of lawsuit
49	Simone Niven, Global Head of Corporate Communications	c/o Rio Tinto 2 Eastbourne Terrace London W2 6LG United Kingdom Tel: +44 (0) 20 7781 2000	Knowledge of subject matter of lawsuit
50	Tom Albanese, former Chief Executive Officer of Rio Tinto	c/o Vedanta Resources 16 Berkeley St. London United Kingdom	Knowledge of subject matter of lawsuit
51	Virginie Bahon, Head of Communications, Rio Tinto Guinea and Simandou Project	c/o Rio Tinto 2 Eastbourne Terrace London W2 6LG United Kingdom Tel: +44 (0) 20 7781 2000	Knowledge of subject matter of lawsuit
<b>VALE</b>			
52	Clovis Torres, Chief Legal Officer, Vale-BSGR Joint Venture	c/o Vale Av. Graça Aranha, 26 – Centro Rio de Janeiro, RJ, 20030-900 Brazil	Knowledge of negotiations between BSGR and Vale, S.A. related to a potential joint venture at Simandou.

53	Daniella Chimisso, Chief Legal Officer, Vale-BSGR Joint Venture	c/o Vale Av. Graça Aranha, 26 – Centro Rio de Janeiro, RJ, 20030-900 Brazil	Knowledge of negotiations between BSGR and Vale, S.A. related to a potential joint venture at Simandou.
54	Eduardo Etchart	c/o Vale Av. Graça Aranha, 26 – Centro Rio de Janeiro, RJ, 20030-900 Brazil	Knowledge of negotiations between BSGR and Vale, S.A. related to a potential joint venture at Simandou.
55	Jose Andre Alves, Chief Geologist, Vale-BSGR Joint Venture	c/o Vale Av. Graça Aranha, 26 – Centro Rio de Janeiro, RJ, 20030-900 Brazil	Knowledge of negotiations between BSGR and Vale, S.A. related to a potential joint venture at Simandou.
56	Pedro Rodrigues	c/o Vale Av. Graça Aranha, 26 – Centro Rio de Janeiro, RJ, 20030-900 Brazil	Knowledge of negotiations between BSGR and Vale, S.A. related to a potential joint venture at Simandou.
57	Rafael Benke, External Relations, Vale-BSGR Joint Venture	c/o Vale Av. Graça Aranha, 26 – Centro Rio de Janeiro, RJ, 20030-900 Brazil	Knowledge of negotiations between BSGR and Vale, S.A. related to a potential joint venture at Simandou.
58	Ricardo Saad, Project Director, Vale-BSGR Joint Venture	c/o Vale Av. Graça Aranha, 26 – Centro Rio de Janeiro, RJ, 20030-900 Brazil	Knowledge of negotiations between BSGR and Vale, S.A. related to a potential joint venture at Simandou.



59	Roger Agnelli, CEO of Vale-BSGR Joint Venture	c/o Vale Av. Graça Aranha, 26 – Centro Rio de Janeiro, RJ, 20030-900 Brazil	Knowledge of negotiations between BSGR and Vale, S.A. related to a potential joint venture at Simandou.
<b>Other Individual and Businesses</b>			
60	Aboubacar Sampil, CEO of Rio Pongo S.A.	c/o Sable Mining Africa Ltd. St. Brides Media & Finance Ltd. 3 St Michael's Alley, London, EC3V 9DS United Kingdom Tel: +44 020 7236 1177	Knowledge of the corrupt rigging of the March 2010 Guinean Presidential election by which Alpha Conde became President, and of the wrongful misappropriation of BSGR's Simandou mining rights
61	Africa Management (UK) Limited	6th Floor, No. 1 Knightsbridge Green, London SW1X 7QA United Kingdom	Knowledge of the corrupt rigging of the March 2010 Guinean Presidential election by which Alpha Conde became President, and of the wrongful misappropriation of BSGR's Simandou mining rights
62	African Global Capital I, L.P.	c/o Africa Management (UK) Limited 6th Floor, No. 1 Knightsbridge Green London SW1X 7QA United Kingdom	Knowledge of the corrupt rigging of the March 2010 Guinean Presidential election by which Alpha Conde became President, and of the wrongful misappropriation of BSGR's Simandou mining rights
63	Bateman Engineering	Teoova Mining & Minerals (Pty) Ltd 58 Emerald Parkway Road Greenstone Hill, Extension 21 Johannesburg, 1609 South Africa Tel: +27 11 899 9111	Knowledge of BSGR's operations in Guinea concerning its Simandou mining rights and of negotiations between BSGR and Vale, S.A. related to a potential joint venture at Simandou.

64	Chinalco Mining Corporation International	Beijing, China	Knowledge of BSGR's operations in Guinea concerning its Simandou mining rights and of negotiations between BSGR and Vale, S.A. related to a potential joint venture at Simandou.
65	Digby Wells Environmental	Fern Isle, Section 10 359 Pretoria Avenue 2125 Randburg Gauteng, South Africa Tel: +27 11 789-9495	Knowledge of BSGR's operations in Guinea concerning its Simandou mining rights and of negotiations between BSGR and Vale, S.A. related to a potential joint venture at Simandou.
66	Doron Levy	APM & Co. Nitsba Tower, 19th Floor 17 Yitzhak Sadeh Street Tel Aviv 67775 Israel Tel: + 972-3-5689090	Lack of personal jurisdiction with respect to Defendants
67	Foraco International SA	26 Plage de l'Estaque, 13016 Marseille France	Knowledge of BSGR's 2009 Simandou drilling operations
68	Geoprospect	3A Uruguay Street, Jerusalem, Israel	Knowledge of BSGR's 2009 Simandou drilling operations
69	Getma Guinée	Cité Chemin de Fer, Immeuble Kassa BP 1648 Conakry, Guinea Tel: +224 30 41 26 66	Knowledge of expropriation and other unlawful activities of Guinean Government
70	International Mining Consultants	Icon Business Centres Lake View Drive Sherwood Park Nottingham NG15 0DT United Kingdom Tel: + 44 (0) 1623 726166	Knowledge of BSGR's operations in Guinea concerning its Simandou mining rights and of negotiations between BSGR and Vale, S.A. related to a potential joint venture at Simandou

71	Lloyd Pengilly, Former Chairman of JPM Africa, Associate and Advisor to Marc Wilcox, Tokyo Sexwale and Walter Hennig; Member of the African Global Capital Investment Committee	c/o QKR Corp. 10 Tilney Street London W1K 1AE United Kingdom	Knowledge of the corrupt rigging of the March 2010 Guinean Presidential election by which Alpha Conde became President, and of the wrongful misappropriation of BSGR's Simandou mining rights
72	Michael Cohen, Former Och Ziff Partner, responsible for OZ's African investments and the JV with Palladino and Mvelaphanda	c/o Och-Ziff Capital Management Europe Limited 40 Argyll Street London W1F 7EB United Kingdom Tel: +44 207 758 4400	Knowledge of the corrupt rigging of the March 2010 Guinean Presidential election by which Alpha Conde became President, and of the wrongful misappropriation of BSGR's Simandou mining rights
73	Mohamed Condé, son of Guinean President Alpha Condé	Conakry, Guinea	Knowledge of the corrupt rigging of the March 2010 Guinean Presidential election by which Alpha Conde became President, and of the wrongful misappropriation of BSGR's Simandou mining rights
74	Och-Ziff Capital Management Europe Limited	40 Argyll Street London W1F 7EB United Kingdom	Knowledge of the corrupt rigging of the March 2010 Guinean Presidential election by which Alpha Conde became President, and of the wrongful misappropriation of BSGR's Simandou mining rights
75	OZ Management LP	c/o Och-Ziff Capital Management Europe Limited 40 Argyll Street London W1F 7EB United Kingdom Tel: +44 207 758 4400	Knowledge of the corrupt rigging of the March 2010 Guinean Presidential election by which Alpha Conde became President, and of the wrongful misappropriation of BSGR's Simandou mining rights

76	Palladino Capital 2 Limited (f/k/a Floras Bell Limited)	c/o Palladino Holdings, British Virgin Islands	Knowledge of the corrupt rigging of the March 2010 Guinean Presidential election by which Alpha Conde became President, and of the wrongful misappropriation of BSGR's Simandou mining rights
77	Palladino Holdings	British Virgin Islands	Knowledge of the corrupt rigging of the March 2010 Guinean Presidential election by which Alpha Conde became President, and of the wrongful misappropriation of BSGR's Simandou mining rights
78	Snowdeo	Level 3 181 Adelaide Terrace East Perth 6004 Australia Tel: +61 8 9213 9213	Knowledge of BSGR's operations in Guinea concerning its Simandou mining rights and of negotiations between BSGR and Vale, S.A. related to a potential joint venture at Simandou.
79	SOGUIPAMI (State-owned mining company of Guinea)	Conakry, Guinea	Knowledge of receipt of illicit funds from South African business interests in exchange for wrongfully misappropriating BSGR's Simandou mining rights and granting them to entities owned and controlled by such interests
80	SRK Consulting	SRK Johannesburg 265 Oxford Road 2196 Illovo, South Africa Tel: +27 11 441 1111	Knowledge of BSGR's operations in Guinea concerning its Simandou mining rights and of negotiations between BSGR and Vale, S.A. related to a potential joint venture at Simandou
81	Tokyo Sexwale	c/o Mvelapbanda Holdings 23 Glenhove Road Johannesburg, Gauteng 2196 South Africa	Knowledge of the corrupt rigging of the March 2010 Guinean Presidential election by which Alpha Coode became President, and of the wroogful misappropriation of BSGR's Simandou mioing rights

82	Vanja Baros, Africa Director of the Och-Ziff Capital Management Group	c/o Och-Ziff Capital Management Europe Limited 40 Argyll Street London W1F 7EB United Kingdom Tel: +44 207 758 4400	Knowledge of the corrupt rigging of the March 2010 Guinean Presidential election by which Alpha Conde became President, and of the wrongful misappropriation of BSGR's Simandou mining rights
83	WSP Global Inc.	WSP House 70 Chancery Lane London WC2A 1AF United Kingdom Tel: +44 20 7314 5000	Knowledge of BSGR's operations in Guinea concerning its Simandou mining rights and of negotiations between BSGR and Vale, S.A. related to a potential joint venture at Simandou

In addition to those individuals identified above, Defendants hereby incorporate by reference any witnesses and their possible subjects of testimony disclosed by plaintiff and co-defendants in their Initial Disclosure Statements pursuant to FRCP 26(a).

These disclosures are based upon information reasonably available to Defendants at this time, and subject to Defendants' affirmative defense and objection on grounds that the Court lacks personal jurisdiction over Defendants. Defendants reserve the right to amend these initial disclosures, and seek discovery from, and relating to, other persons who may later become known as persons likely to have discoverable information.

Defendants have not yet designated expert witnesses, but may do so in accordance with the requirements set forth in the Federal Rules of Civil Procedure. Defendants will disclose the identity of any retained expert whom they expect to call as a witness at trial as appropriate.

Discovery, fact investigation, and trial preparation are ongoing, and Defendants reserve the right to supplement or correct this disclosure in light of further discovery, fact investigation, and trial preparation, if required, in accordance with FRCP 26(e).



**B. Relevant Unprivileged Documents**

Defendants incorporate each of the general objections and limitations set forth above into the following disclosures. Pursuant to FRCP 26(a)(1)(A)(ii), and subject to, and without waiver of, the objections and limitations stated above and set forth herein, Defendants hereby describe the following categories of documents, electronically stored information, and/or tangible things (collectively, "Documents") that are within their possession, custody, or control, and may be used to support their claims or defenses in this action, other than solely for impeachment:

**Description by Category and Location**

- Documents concerning Defendants' affirmative defenses and the bases identified in Defendants' anticipated motion to dismiss in this action, including but not limited to personal jurisdiction.
- Documents concerning BSGR's research and development of mining operations at Simandou.
- Documents concerning negotiations between BSGR and Vale, S.A. related to a potential joint venture at Simandou.
- Documents concerning the Guinean Government's award of mining interests in Simandou to BSG Resources (Guinea) Limited and BSG Resources (Guinea) SARL, and subsequent assignment of that interest to VBG-Vale BSGR Guinea.

The above documents are located c/o Navigant Consulting, Inc. in Geneva, Switzerland, Guernsey, Channel Islands, London, England, and South Africa.

Defendants identify the categories of documents listed above without waiver of their right to object to the production of any particular document. Defendants further state that they make these disclosures based upon information reasonably available to them at this time. Discovery, fact investigation, and trial preparation are ongoing, and Defendants reserve the right to supplement or correct these disclosures in light of further discovery, fact investigation, and trial preparation, if required, in accordance with FRCP 26(e).

**C. Computation of Damages**

This section is presently not applicable to Defendants. Discovery, fact investigation, and trial preparation are ongoing, and Defendants reserve the right to supplement or correct this disclosure in light of further discovery, fact investigation, and trial preparation, if required, in accordance with FRCP 26(e).

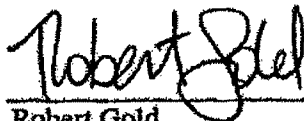
**D. Insurance Agreements**

Subject to, and without waiver of, the objections and limitations stated above and set forth herein, Defendants are not aware of any insurance agreement whereby an insurance company may be liable to satisfy all or part of any judgment that may be entered in this matter or be used to indemnify or reimburse payments made to satisfy any judgment.

Dated: September 3, 2014

Respectfully submitted,

MISHCON DE REYA NEW YORK LLP

By:   
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*Attorneys for Defendants Benjamin Steinmetz  
and BSG Resources Limited*

**CERTIFICATE OF SERVICE**

I, Kavitha S. Sivashanker, hereby certify that a true and correct copy of Defendants Benjamin Steinmetz's and BSG Resources Limited's Amended Initial Disclosures Pursuant to Fed. R. Civ. P. 26(a)(1) was served upon the following attorneys of record by Electronic Mail on September 3, 2014:

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